

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHAEL WATSON, INDIVIDUALLY,  
AND AS FATHER AND NEXT FRIEND  
OF JOHN WATSON,

Plaintiff,

v.

ELECTROLUX PROFESSIONAL  
OUTDOOR PRODUCTS, INC.

Defendant.

CIVIL ACTION  
NO: 04-11782DPW

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

The parties hereby move this Court to extend the time needed to make expert disclosures by sixty days. In support of their motion, the parties state as follows:

1. This is a complex product liability case in which the Plaintiff, Michael Watson, alleges that he sustained serious personal injuries as a result of a defectively designed electric cut-off saw manufactured and sold by the Defendant, Electrolux Professional Outdoor Products a/k/a Partner Outdoor Products.
2. On September 28, 2004, this Court issued an order requiring that the Plaintiff provide his expert disclosures by May 30, 2005, and that the Defendant provide expert disclosures by June 30, 2005. The order provided that depositions may take place up until August 31, 2005.
3. The parties have exchanged discovery requests but the Defendant has indicated that it will require some additional time to provide responsive answers. Presently, the Defendant believes it will be able to provide responsive answers on or before May 15, 2005.
4. Plaintiff anticipates that he will need an additional sixty days to allow his experts to review the material produced by the Defendant regarding the subject product. Plaintiff may also need additional time to request appropriate, limited supplementation to the Defendant's responses.
5. This is the first request for an extension made by the parties in this case and the parties are cooperating to resolve any outstanding discovery issues.

Wherefore, the parties request that this Court modify its September 28, 2004 order to permit the Plaintiff to make his expert disclosures on or before July 30, 2005, the Defendant to make its expert disclosures on or before August 30, 2005, and depositions to take place until October 30, 2005.

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By his Attorneys

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